

**Commonwealth of Kentucky
Division for Air Quality**

RESPONSE TO COMMENTS

ON THE CONDITIONAL MAJOR DRAFT PERMIT F-07-034

Sensus Precision Die Casting

Russellville, KY 42276

November 19, 2007

Vahid Bakhtiar, Reviewer

SOURCE ID: 21-141-00022

SOURCE A.I. #: 2755

ACTIVITY ID: APE20060002

SOURCE DESCRIPTION:

Sensus Precision Die Casting (Sensus), formerly Invensys Precision Die Casting, is an aluminum die casting plant located in Russellville, Kentucky that manufactures aluminum components for a wide range of markets, including automotive, gas meter, small engine, and electronics industries. The die casting process begins with the melting and processing of clean charge in natural gas-fired melting furnaces. Other source operations primarily consist of aluminum die casting operations and metal cleaning and surface coating operations. The Standard Industrial Classification (SIC) Code for this aluminum die casting source is 3363. The Lindberg Barrel Furnace, EP 32, has been removed from service and dismantled. EP 35, the Kimball 4 wall Acme Fab washing machine has been removed from the plant.

PUBLIC AND U.S. EPA REVIEW:

On October 19, 2007, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in the *News-Democrat & Leader* in Russellville, Kentucky. The public comment period expired 30 days from the date of publication.

Comments were received from Environmental Management Services, Inc., on behalf of Sensus, on November 15, 2007. Attachment A to this document lists the comments received and the Division's response to each comment. Minor changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed. Please see Attachment A for a detailed explanation of the changes made to the permit.

ATTACHMENT A

Response to Comments

One comment on Sensus Precision Die Casting Draft Conditional Major Air Quality Permit submitted by William Ney Hansard.

Conditional Major Permit

The VOC value for actual emissions in the Emission Summary, on page 2 of 3 of the Permit Application Summary Form, is reported to be from the DAQ's 2006 Emissions Inventory Report. The reported actual value in the Emissions Summary is reported at 65 tons per year (tpy), while the potential emissions are 37.04 tpy. We believe that the 65 tpy value reported in the DAQ 2006 Emissions Inventory Report is in error. Actual VOC emissions from the plant are believed to be only a fraction of this value, less than 10 tpy.

Division's response: This value was reported by Sensus for the 2006 Emissions Inventory Report and does not reflect the current potential emissions. The potential emissions are reflective of potential production data and the source configuration, as provided by the permittee during permit review. As specified in the Statement of Basis to the draft permit, equipment previously located at the source has been eliminated and lower potential emissions are attributable to such changes. Comment acknowledged, no change made.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.